

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**IN RE: Acetaminophen – ASD-ADHD Products Liability
Litigation** Docket No. 22-md-3043 (DLC)

This Document Relates To: *All Cases*

**DECLARATION OF ASHLEY C. KELLER
IN SUPPORT OF PLAINTIFFS' RESPONSE TO
ORDER TO SHOW CAUSE, DKT. 1496**

I, ASHLEY C. KELLER, an attorney duly admitted pro hac vice to practice law in this Court, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am a Partner with the law firm of Keller Postman LLC. I serve as co-lead counsel for Plaintiffs in the above-referenced litigation.
2. I have personal knowledge of the following facts set forth in this Declaration and, if called as a witness, I could and would competently testify as to the matters stated herein.
3. Attached hereto as **EXHIBIT 1** is a true and correct copy of the Amended Expert Report of Stephen Faraone, Ph.D. Defendants served this document on Plaintiffs on August 22, 2023, in connection with this action.
4. Attached hereto as **EXHIBIT 2** is a true and correct copy of the September 7, 2023 deposition transcript of Dr. Stephen Faraone.
5. Attached hereto as **EXHIBIT 3** is a true and correct copy of Melissa Mulraney et al., *International Consensus on Standard Outcome Measures for Neurodevelopmental Disorders: A Consensus Statement*, 7 JAMA Network Open 1 (2024).

6. Attached hereto as **EXHIBIT 4** is a true and correct copy of Nidhin Joseph et al., *Oxidative Stress and ADHD: A Meta-Analysis*, 19 J. Attention Disorders 915 (2015), which was Exhibit 785 to the September 7, 2023 deposition of Dr. Stephen Faraone.

7. Attached hereto as **EXHIBIT 5** is a true and correct copy of Stephen Faraone, *Does Acetaminophen Use During Pregnancy Cause ADHD in Offspring?*, LinkedIn (Aug. 22, 2016), which was Exhibit 705 to the September 7, 2023 deposition of Dr. Stephen Faraone.

8. Attached hereto as **EXHIBIT 6** is a true and correct copy of Stephen Faraone, *ADHD and Acetaminophen Use During Pregnancy*, LinkedIn (Oct. 31, 2017), which was Exhibit 763 to the September 7, 2023 deposition of Dr. Stephen Faraone.

9. Attached hereto as **EXHIBIT 7** is a true and correct copy of *The World Federation of ADHD Guide* (Luis Augusto Rohde et al. eds., 2019), which was Exhibit 780 to the September 7, 2023 deposition of Dr. Stephen Faraone.

10. Attached hereto as **EXHIBIT 8** is a true and correct copy of Stephen Faraone, *Does Acetaminophen Use During Pregnancy Cause ADHD in Offspring?*, APSARD (May 18, 2020), which was Exhibit 764 to the September 7, 2023 deposition of Dr. Stephen Faraone.

11. Attached hereto as **EXHIBIT 9** is a true and correct copy of *Does Acetaminophen Use During Pregnancy Cause ADHD in Offspring?*, ADHD Evidence Project (Mar. 14, 2021), which was Exhibit 765 to the September 7, 2023 deposition of Dr. Stephen Faraone.

12. Attached hereto as **EXHIBIT 10** is a true and correct copy of *ADHD and Acetaminophen Use During Pregnancy*, ADHD Evidence Project (Mar. 16, 2021), which was Exhibit 766 to the September 7, 2023 deposition of Dr. Stephen Faraone.

13. Attached hereto as **EXHIBIT 11** is a true and correct copy of Stephen V. Faraone et al., *The World Federation of ADHD International Consensus Statement: 208 Evidence-Based*

Conclusions About the Disorder, 128 Neurosci. & Biobehavioral Revs. 789 (2021), which was Exhibit 781 to the September 7, 2023 deposition of Dr. Stephen Faraone.

14. Attached hereto as **EXHIBIT 12** is a true and correct copy of excerpts of a 2022 slide deck prepared by Stephen V. Faraone, Ph.D., titled *An Overview of Attention Deficit Hyperactivity Disorder*, which was Exhibit 771 to the September 7, 2023 deposition of Dr. Stephen Faraone.

15. Attached hereto as **EXHIBIT 13** is a true and correct copy of Nayla M. Khoury et al., *From Structural Disparities to Neuropharmacology: A Review of Adult Attention-Deficit/Hyperactivity Disorder Medication Treatment*, 31 Child & Adolescent Psychiatric Clinics N. Am. 343 (2022), which was Exhibit 784 to the September 7, 2023 deposition of Dr. Stephen Faraone.

16. I swear under penalty of perjury that the foregoing is true and correct.

Dated: July 25, 2024

Respectfully submitted,

KELLER POSTMAN LLC

/s/ Ashley C. Keller
Ashley C. Keller (IL Bar #1029118)*
KELLER POSTMAN LLC
150 N. Riverside Plaza, Suite 4100
Chicago, Illinois 60606
(312) 741-5220
ack@kellerpostman.com
**Admitted Pro Hac Vice*

Attorney for Plaintiffs